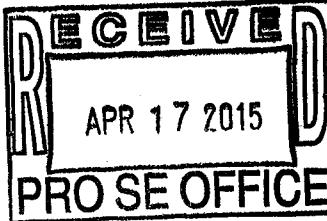


PRO SE INTAKE UNIT  
 United States District Court  
 Southern District of New York  
 U.S. Courthouse - 500 Pearl Street  
 New York, N.Y. 10007

4/17/15



Michael Spiegel,  
 Plaintiff  
 against

Erin Bekowies, et al.,  
 Defendants.

Case # 14 cv 3045 (LGS) (FM)

Letter re: Depositions scheduling

COPY TO: HON. FRANK MAAS  
 = = = = =

Dear Judge Maas,

On April 16, 2015, counsel for defense sent me a letter (attached), addressed to me, and copied to your Honor.

I am now responding in the same manner, with the attached letter to counsel for defense, and with a copy forwarded to you.

Truly yours,  
 Michael Spiegel  
 pro se Plaintiff

April 17, 2015

Carolyn Grimaldi  
Greenwald Doherty LLP  
30 Ramland Road, Suite 201  
Orangeburg, NY 10962

Re: Spiegel v. Bekowies, et al.  
Index No. 14-Civ.3045 (LGS)(FM)

Dear Ms. Grimaldi,

I am in receipt, by email, of your letter of April 16th, attached. There are some important details regarding the scheduling of depositions, as suggested in your letter, to which I disagree. Specifically:

1. The hours you suggest for the three depositions of May 15th, May 18th and May 26th, are approximations only, and can not be construed as the exact times for these depositions. That is because it is impossible to say exactly how long each deposition will take to complete. While I will conduct the depositions for each of these three days in the order of appearance that you provide, the subsequent deponents for each day will need to be at the courthouse earlier than the times you give, in case the preceding deposition finishes earlier. It is acceptable to me that the times be adjusted one hour earlier, to accommodate this.

Which means that on May 15th, that Mujovic needs to be ready to be deposed at 11:00 a.m., and not at 12:00 p.m., as you wrote. Then Shyu will be ready at 1:30 p.m. On May 18th, Valencia will be ready at 1:30 p.m. And on May 26th, Teixeira at 11:00 a.m. and Edgar at 1:30 p.m.

Please advise if you are in agreement to these modifications.

2. The depositions of Canavan on June 1st, and of Sefrankova on June 8th, each starting at 9:00 a.m., I consider to be firm dates, by Judge Maas' order. If there is any problem over these dates, you need to let me know by April 24, 2015. There is little flexibility left in scheduling depositions, and I want to depose these two individuals

after I depose the parties (with the exception of Bekowies, to accommodate her new employment situation).

Please keep in mind that for all the depositions, there can be no guarantee that all the depositions for a particular day will be completed on that day. Though I will do everything I can to make that happen, still, I can not compromise the quality of the depositions, so if necessary, a deposition may have to continue to another day.

3. Regarding my deposition on May 8th, I see that you have changed the deposition address from your offices in Orangeburg to a location on Third Avenue in New York City. Your Notice for Deposition, copy attached, shows the Orangeburg address. This is also the deposition address that Judge Maas ordered, at the recent telephone conference of April 12th. So I expect to be deposed in Orangeburg.

Yours truly,



Michael Spiegel  
Pro Se Plaintiff  
101 Cooper St, #1E  
New York, NY 10034  
212-568-3428

cc: Hon. Frank Maas

GREENWALD  
LLPDOHERTY  
ATTORNEYS AT LAW30 Ramland Road Suite 201  
Orangeburg, New York 10962  
Tel: 845 589 9300  
Fax: 845 638 2707

April 16, 2015

**VIA Email and U.S. Mail**

Michael Spiegel  
101 Cooper Street, #1E  
New York, NY 10034

**Re: Spiegel v. Bekowies et al. Index Number: 14-cv-3045 (LGS)(FM)**

Dear Mr. Spiegel:

As you know, this office represents Defendants in the above-referenced matter.

Pursuant to the conference held before Judge Maas on April 14, 2015, please find below the schedule of depositions in this matter, as of today's date, for endorsement by Judge Maas. Unless otherwise stated, depositions will be conducted at the U.S. District Courthouse, 500 Pearl Street, New York, New York (room number(s) to be provided by Plaintiff).

**May 8, 2015** (10:00 a.m.-5:00 p.m.): Deposition of Plaintiff, Michael Spiegel (Greenwald Doherty, LLP, 630 3<sup>rd</sup> Avenue, 15<sup>th</sup> Floor, New York, New York);

**May 15, 2015**

(9:00 a.m. – 11:30 a.m.) – Youssef Farah (Defendant)  
(12:00 p.m. – 2:30 p.m.) – Shkurte Mujovic (Defendant)  
(2:30 p.m. – 5:00 p.m.) – Michael Shyu (Defendant)

**May 18, 2015**

(9:00 a.m. – 2:00 p.m.) – Małgorzata Sowa (Defendant)  
(2:30 p.m. – 5:00 p.m.) – Jorge Valencia (Defendant)

**May 26, 2015**

(9:00 a.m. – 11:30 a.m.) – Zenorina Gonzalez (Defendant)  
(12:00 p.m. – 2:30 p.m.) – Ronaldo Teixeira (Defendant)  
(2:30 p.m. – 5:00 p.m.) – Marla Edgar (Defendant)

630 Third Ave. 15th Floor  
New York, NY 10017  
TEL: 212.644.1310

1 Bridge Plaza N. Ste. 275  
Fort Lee, NJ 07024  
TEL: 201.862.9644

263 Tresser Blvd. 9th Floor  
Stamford, CT 06901  
TEL: 203.328.7598

1650 Market Street 36th Fl  
Philadelphia, PA 19103  
TEL: 215.575.1180

**June 1, 2015** (9:00 a.m. – 5:00 p.m.): Proposed for John Canavan (non-party) (subpoena to be served on Deponent by Plaintiff; date pending availability of Deponent)

**June 8, 2015** (9:00 a.m. – 5:00 p.m.): Proposed for Katarina Sefrankova (non-party) (subpoena to be served on Deponent by Plaintiff; date pending availability of Deponent)

**June 9, 2015** (9:00 a.m. – 5:00 p.m.): Erin Bekowies (Defendant).

Once you have confirmed the appropriate room number(s) for the depositions you will be conducting, please let us now.

Should you have any questions or concerns, please don't hesitate to contact us. Thank you for your attention.

Very truly yours,



Carolyn J. Grimaldi, Esq.

cc: Hon. Frank Maas (Via Facsimile (212) 805-6724))

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MICHAEL SPIEGEL,

Plaintiff,

v.

ERIN BEKOWIES, MICHAEL SHYU,  
MALGORZATA SOWA, YOUSSEF  
FARAH, SHKURTE MUJOVIC,  
ZENORINA GONZALEZ, RONALDO  
TEIXEIRA, JORGE VALENCIA, and  
MARLA EDGAR,

Defendants.

Case No. 14 Civ. 3045 (LGS)(FM)

**NOTICE FOR DEPOSITION  
PURSUANT TO FRCP 30**

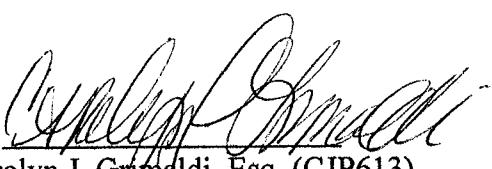
PLEASE TAKE NOTICE that, pursuant to FRCP 30, the undersigned will take the deposition upon oral examination of, MICHAEL SPIEGEL, at Greenwald Doherty LLP, attorneys for the Defendants herein, located at 30 Ramland Road, Suite 201, Orangeburg, New York, 10962, before a notary public, court reporter, videographer or other such officer authorized to take depositions, which will be recorded by stenographic and/or videographic means, commencing at 10:00 A.M. on May 8, 2015, and continuing from day to day until completed.

Dated: Orangeburg, New York  
April 13, 2015

GREENWALD DOHERTY LLP

By:

Carolyn J. Grimaldi, Esq. (CJP613)  
Kevin M. Doherty, Esq. (KD3492)



30 Ramland Road, Suite 201  
Orangeburg, New York 10962  
Phone: 845-589-9300  
Facsimile: 845-638-2707  
CG@GreenwaldLLP.com  
KD@GgreenwaldLLP.com  
*Attorneys for the Defendants*

To: Michael Spiegel  
101 Cooper Street, #1E  
New York, New York 10034  
Email: michaelspiegel0@lycos.com; spiegeltheresa@aol.com